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May 10, 2017

**BY ECF**

Honorable Laura Taylor Swain  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Segura, et al. v. Inkay Corp., et al.,  
16-cv-4099 (LTS)

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. Plaintiffs write to respectfully request a brief extension of time to respond to Defendants' summary judgment motion from today, May 10, 2017 to May 31, 2017. This is Plaintiffs' first request for an extension of time to respond to Defendants' summary judgment motion; Plaintiffs' counsel called Defendants' counsel to seek their consent for this motion, however he was unavailable. The undersigned will supplement this letter motion with Defendants' position on the proposed extension when received.

The requested extension is necessary to finalize Plaintiffs' affidavits and supporting materials in response to Defendants' motion. In addition, the undersigned has recently concluded a three day bench trial in *Rosales v. Gerasimos Enterprises Inc.*, 16-cv-2278 (RA)(AJP) and is scheduled to proceed with a bench trial before the Honorable Judge Caproni in *Gonzalez v. Masters Health Food Service Inc.*, 14-cv-7603 (VEC) beginning May 15<sup>th</sup> through approximately May 22, 2017. In light of the need to finalize supporting documents and due to significant conflicting litigation responsibilities of counsel, Plaintiffs respectfully request a brief extension of time to respond to Defendants' summary judgment motion from today, May 10, 2017 to May 31, 2017.

Plaintiffs thank the Court for its time and attention to this matter.

Respectfully Submitted,

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/s/  
Shawn Clark  
Michael Faillace & Associates, P.C.  
*Attorneys for Plaintiffs*

cc: (By ECF)  
Martin E. Restituyo  
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